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December 10, 2004



DEC 1 5 2004

PUBLIC SERVICE COMMISSION

## Via Federal Express

Ms. Elizabeth O'Donnell Executive Director Public Service Commission 211 Sower Boulevard, P.O. Box 615 Frankfort, Kentucky 40602-0615

Re: In the matter of: The Application of Big Rivers Electric Corporation

for a Certificate of Public Convenience and Necessity to Construct a 161 kV Transmission Line in Breckinridge and Meade Counties,

Kentucky, PSC Case No. 2004-00365

Dear Ms. O'Donnell:

Enclosed are an original and ten copies of a motion for enlargement of time filed by Big Rivers Electric Corporation Please feel free to contact me with any questions.

Sincerely yours,

Tyson A. Kamuf

TAK/ej Enclosures

cc: David Spainhoward

Telephone (270) 926-4000 Telecopier (270) 683-6694

RECEIVED

## COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

DEC 1 5 2004

PUBLIC SERVICE COMMISSION

In the matter of:		
)		
The Application of Big Rivers Electric Corporation )	Case No. 2004-00365	
for a Certificate of Public Convenience and )		
Necessity to Construct a 161 kV Transmission Line)		
in Breckinridge and Meade Counties, Kentucky )		

## MOTION OF BIG RIVERS ELECTRIC CORPORATION FOR AN ENLARGEMENT OF TIME

Big Rivers Electric Corporation ("Big Rivers") moves the Public Service Commission ("Commission") for an enlargement of time in which to file data requests, if any, directed to the Commission's consultant regarding its report, and for an enlargement of time for the consultant to respond to any data requests that Big Rivers may file. In support of its motion, Big Rivers states:

- 1. The Commission's procedural order dated December 1, 2004, states that the Commission consultant's report will be filed on December 22, 2004, and that data requests by the parties to the consultant regarding its report will be filed no later than December 30, 2004. Big Rivers anticipates that the Commission consultant's report will deal primarily with Big Rivers' transmission studies.
- 2. The principal Big Rivers employee involved in the transmission studies for the transmission line that is the subject of this case is Chris Bradley. He has been primarily responsible for preparation of the application and data request responses in this matter, and will be Big Rivers' principal witness in this case on the transmission studies, if Big Rivers decides to file testimony. He was also the Big Rivers employee who met with the Commission's consultant during the consultant's work in Big Rivers' offices.

3. Mr. Bradley commences a well-deserved, if ill-timed, vacation at noon on December

22, 2004, the date on which the consultant's report is due to be filed at the Commission. He does

not return from vacation until Monday, January 3, 2005. Big Rivers' offices are also closed for

the Christmas holiday on December 23 and 24. Mr. Bradley's input is critical to Big Rivers'

decision about whether data requests should be filed, and if so, what questions should be asked.

There is no other Big Rivers employee who can substitute for Mr. Bradley to perform these tasks

knowledgeably. He is the single engineer at Big Rivers who performs transmission studies.

4. For the reasons stated above, Big Rivers respectfully moves that the procedural

schedule, as it applies to Big Rivers, be adjusted as follows:

Big Rivers' data requests to the Commission's consultant regarding the consultant's

report, if any, will be filed no later than January 5, 2005.

The Commission consultant's responses to Big Rivers' data requests due January 5, 2005,

will be filed no later than January 12, 2005.

5. Big Rivers further requests that the report of the Commission's consultant be made

available to the parties before noon on December 22, 2004.

WHEREFORE, Big Rivers respectfully requests that the Commission make an order

granting the relief requested, and all other relief to which it may appear entitled.

On this the 14<sup>th</sup> day of December, 2004.

SULLIVAN, MOUNTJOY, STAINBACK

& MILLER, P.S.C.

James M. Miller

Tyson Kamuf

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